reconsideration of the pending claims is respectfully requested. Please note that the Applicants' Remarks set forth in the Amendment of ***July 17, 2000***, is hereby incorporated by reference.

The claimed invention is directed to a semiconductor device including the combination of a resinous layer between a resinous substrate and a thin film transistor (TFT), with another resinous layer (a resinous interlayer insulating layer) provided over the TFT, as set forth at least in independent claims 1, 5, 11 and 12 of the present invention. During the manufacture of semiconductor devices, it is preferable to employ a lower temperature process on the resinous substrate during the formation of the TFT thereon because resinous substrates are damaged at high temperatures. Page 6, lines 10-12 of Applicants' specification discloses that heat-treatment of the resinous layer before forming the TFT is preferably conducted at a temperature higher than the highest temperature applied in later processes. In the case of forming an interlayer insulating layer comprising silicon oxide or silicon nitride over the resinous substrate by PCVD, the resinous substrate is damaged because the substrate is heated at the temperature of 300°C or more. However, the claimed invention is advantageous since the resinous interlayer insulating layer can be formed by a coating method at lower temperatures than PCVD without damaging the resinous substrate. Thus, a resinous interlayer insulating layer is preferable for a resinous substrate.

With respect to foregoing unobvious advantages provided by the claimed invention, the Office Action asserts that "limitations from the specification are not read into the claims." Applicants respectfully submit that the advantages are being solicited to rebut the §103 rejection as probative evidence of the nonobviousness of the claimed invention. §2144.08(B) of the M.P.E.P. states that rebuttal evidence and arguments can be presented by counsel. *See, In re Chu*, 66 F.3d 292, 299 36 USPQ.2d 1089, 1094-95 (Fed. Cir. 1995). The Supreme Court states that rebuttal evidence may include evidence of secondary considerations such as long felt and unsolved needs. *Graham v. John Deere*, 383 U.S. 1, 17 (1966). Moreover, rebuttal evidence may also include evidence that the claimed invention yields unexpectedly improved properties or properties not present in the prior art. *In re Dillon*, 919 F.2d 688, 692-693, 16 USPQ.2d 1897, 1901 (Fed. Cir. 1990). Last,

consideration of rebuttal evidence and arguments require Office personnel to weigh the proffered evidence and arguments. M.P.E.P. §2144.08(B).

Applicants respectfully submit that the claimed feature of providing a resinous interlayer insulating layer on a resinous substrate is not expressly disclosed or implicitly suggested in the prior art. Moreover, the unobvious advantageous yielded by the combination of a resinous interlayer insulating layer on a resinous substrate is probative as to the nonobviousness of the claimed invention since it provides an unobvious manufacturing advantage not present in the prior art. Accordingly, Applicants respectfully request that this unobvious advantage be afforded patentable weight in the examination of the present invention.

Since the proposed ***Wakai*** modification fails to disclose every feature of the claimed invention, and further fails to expressly disclose or implicitly suggest the unobvious advantages yielded therein, Applicants respectfully submit that the proposed ***Wakai*** modification fails to render the claimed invention obvious. Therefore, Applicants respectfully request that the §103(a) rejection of the pending claims be reconsidered and withdrawn in view thereof.

For the reasons expressed above, it is respectively submitted that claims 1-8 and 11-37 are in proper condition for allowance. If the Examiner feels that any further discussions would be beneficial in this matter, it is requested that the undersigned be contacted.

Respectfully submitted,

Eric J. Robinson
Registration No. 38,285
NIXON PEABODY LLP
8180 Greensboro Drive, Suite 800
McLean, Virginia 22102
(703) 790-9110

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